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F. #2022R00940

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

TERRENCE WISE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ALBERT CRAWFORD, being duly sworn, deposes and states that he is a Detective with the New York City Police Department and a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives, duly appointed according to law and acting as such.

On or about November 9, 2022, within the Eastern District of New York and elsewhere, the defendant TERRENCE WISE did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire and one or more explosives, a vehicle and other real and personal property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a U-Haul van in Brooklyn, New York.

(Title 18, United States Code, Section 844(i))

**TO BE FILED UNDER SEAL**

**AFFIDAVIT AND  
COMPLAINT IN SUPPORT  
OF APPLICATION FOR  
ARREST WARRANT**

(18 U.S.C. § 844(i))

Case No. 22-MJ-1254

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I have been a member of the New York City Police Department ("NYPD") for over 17 years and have held the rank of Detective for approximately nine years. I am currently assigned to the Arson and Explosion Squad of the NYPD and am a Task Force Officer assigned to work jointly with the Bureau of Alcohol, Tobacco, Firearms and Explosives. In that capacity, I have participated in the investigation of numerous cases involving arson, explosives and firebombs, including the use of improvised incendiary devices, also known as "Molotov cocktails," and I have conducted physical and electronic surveillance, interviewed witnesses, participated in the execution of court-authorized search warrants and used other investigative techniques to obtain relevant information regarding these and other crimes.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in this affidavit are set forth in sum and substance and in part.

November 4, 2022: WISE Throws an Incendiary Device

3. Law enforcement has obtained security camera video with audio from a business in the vicinity of Belmont Avenue between Georgia Avenue and Sheffield Avenue in Brooklyn, New York. The video from that location on the evening of November 4, 2022 shows the defendant TERRENCE WISE, a Black man with a bald head, wearing a yellow T-shirt, blue

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

jeans, and tan boots.<sup>2</sup> Starting at approximately 7:15 p.m., the video shows WISE picking up a transparent bottle from the ground, getting into the driver's side of a white U-Haul van with the words "\$19<sup>95</sup> IN TOWN" in green on its side ("the White U-Haul Van"), pouring the contents of a red gasoline container into the bottle and placing toilet paper into the bottle.<sup>3</sup> Based on my training and experience, I know that a glass bottle, gasoline and toilet paper can be used in this way to create an improvised incendiary device, also known as a "Molotov cocktail." The video then shows WISE driving away in the White U-Haul Van at approximately 7:27 p.m.

4. At approximately 7:41 p.m., security camera video from a hotel located at 369 Glenmore Avenue shows the White U-Haul Van parking at the intersection of Glenmore Avenue and Sheffield Avenue, approximately two blocks north of the area on Belmont Avenue where the defendant TERRENCE WISE assembled the incendiary device. The video shows WISE getting out of the driver's seat and holding an object that is lit on fire. The video then shows WISE throwing the lit object in the direction of a black van parked across from 369 Glenmore Avenue (the "Black Van"), at which point a burst of flames can be seen near the Black Van (see Figure 1 below). The video then shows another person near the Black Van firing a shot and shows WISE getting back into the White U-Haul Van and driving away.

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<sup>2</sup> I believe that the person shown in the videos referenced herein is the defendant TERRENCE WISE because, among other reasons: (1) the person's facial appearance and body type match a prior arrest photograph of WISE and descriptions of him contained in prior law enforcement records; and (2) the person in the videos answers to a nickname used by WISE and asserts that he lives at an address (a) reported as WISE's residence in law enforcement records in connection with a domestic incident in March 2022, and (b) listed in New York City Fire Department records as WISE's residence in February 2022, and at which fire marshals visited WISE and spoke with him in person at that time (see ¶ 9, below).

<sup>3</sup> Where the time stamps on security cameras mentioned in this affidavit differ from the actual time of day (e.g., a time stamp that is eight minutes ahead of the actual time), this affidavit uses the correct time of day after adjusting for that difference.

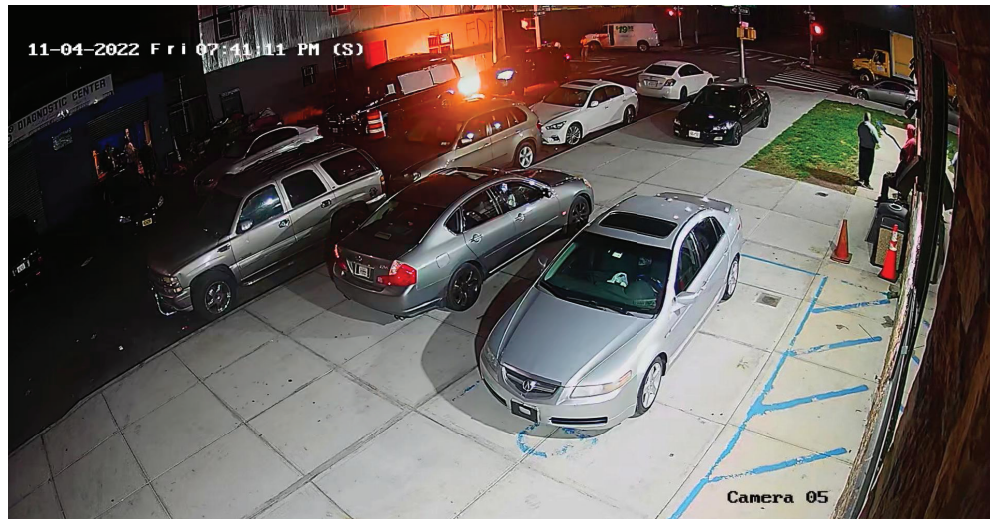


Figure 1

November 7, 2022: WISE Lights Two Fires on and Near the Black Van

5. Security camera video from the same hotel from November 7, 2022 at approximately 9:02 a.m.—less than three days later—shows the White U-Haul Van stopping alongside the Black Van across from 369 Glenmore Avenue. The video then shows flames coming from the front passenger side of the White U-Haul Van onto the Black Van, causing the Black Van to briefly catch fire (see Figure 2 below).



Figure 2

6. Additional video from the same location approximately 9:12 a.m. on the same day—ten minutes later—shows the White U-Haul Van returning to the corner of Glenmore



Avenue and Sheffield Avenue, at the end of the block where the Black Van was parked. The video shows the driver getting out of the White U-Haul Van holding a red gasoline container (see, e.g., Figures 3 and 4 below), approaching the Black Van parked across from 369 Glenmore Avenue, and staying behind the Black Van for approximately 20 seconds. During that period, flames can be seen near the Black Van. The video then shows the man getting back into the driver's seat of the White U-Haul Van while still holding the red gasoline container, and driving away.



Figure 3



Figure 4

7. Photographs of the scene taken after the above-described incidents show a shattered glass bottle on the street near the Black Van.

8. Video from the Belmont Avenue security camera with audio described above from approximately 8:46 a.m. on November 7, 2022—approximately 16 and 26 minutes before the incidents described above, respectively—shows the defendant TERRENCE WISE driving the White U-Haul Van.

November 9, 2022: WISE Sets Fire to the White U-Haul Van

9. Video from the Belmont Avenue security camera with audio from November 9, 2022 at approximately 12:33 a.m. shows the defendant TERRENCE WISE getting out of the driver's seat of the White U-Haul Van. The video captures WISE exclaiming, "Any [N-word] that got a contract on me, come see me. I live 407 Montauk [sic]. Come see me. I'm coming. There's gonna be hell to pay." New York City Fire Department records indicate that in February 2022, WISE lived at 407 Montauk Avenue, Brooklyn, New York, and fire marshals visited him there and spoke with him. A domestic incident report from March 2022 also indicates that WISE was living at 407 Montauk Avenue at that time.

10. At approximately 1:09 a.m., the security camera video shows the defendant TERRENCE WISE throwing a red gasoline container onto the ground during an argument with another person. At approximately 1:10 a.m., the video shows a van being intentionally rammed into the White U-Haul Van being driven by WISE. The video shows WISE running after that other van with a bat in his hand. At approximately 1:12 a.m., the video captures WISE saying, "Truck going on fire. Get that gas container. Get that gas container. Nobody's selling here. Bring that container. Get it quick." Approximately one minute later, the video shows a woman calling, "Black," and WISE turning his head and responding, "What?" Law enforcement records indicate that WISE uses the nickname "Black."

11. At approximately 1:13 a.m., the video shows the defendant TERRENCE WISE holding the red gasoline container and lighting a fire inside the White U-Haul Van. The video shows the fire expanding and damaging the White U-Haul Van over the next several minutes (see Figure 5 below).



Figure 5

Use of U-Haul Vehicles in Interstate Commerce

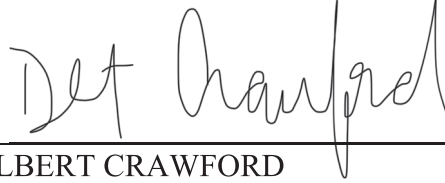
12. I have reviewed photographs showing that the White U-Haul Van, which was located in New York, had an Arizona license plate. Based on my training and experience, I know that U-Haul is a company that rents motor vehicles in interstate commerce.

Request for Sealing

13. I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. This matter relates to an ongoing criminal investigation that is not yet public, and premature disclosure of the contents of this affidavit and related documents would seriously jeopardize the investigation, including by giving the defendant an opportunity to flee from prosecution, change patterns of behavior or destroy or tamper with evidence.

Conclusion

WHEREFORE, your deponent respectfully requests that an arrest warrant for the defendant TERRENCE WISE be issued so that he may be dealt with according to law.

A handwritten signature in black ink, appearing to read "Det Crawford", is written over a horizontal line.

ALBERT CRAWFORD  
Detective  
New York City Police Department

Sworn to before me by telephone this  
28 day of November, 2022 at 1:01 p.m.

***/s/ Roanne L. Mann***

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THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK